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IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

IN RE:)		
)		
Suzanne Elaine Black,)	Case No.	13-13236-SH
)	Chapter	7
DEBTOR(S).)	•	

MOTION FOR RELIEF FROM AUTOMATIC STAY, MOTION FOR ORDER OF ABANDONMENT AND NOTICE OF OPPORTUNITY FOR HEARING

Cenlar, FSB, Creditor, moves this Court to grant relief from the automatic stay and to authorize abandonment of property of the estate pursuant to 11 U.S.C. Sections 362 and 554. In support of this Motion, Creditor would show the Court as follows:

- 1. Debtor filed a Voluntary Petition for Relief under Chapter 7 of Title 11 of the United States Bankruptcy Code on July 17, 2013.
- 2. Debtor claims ownership in the following real estate located in McClain County, State of Oklahoma:

Lot Seven (7) of Block Three (3), in QUAIL HAVEN SUBDIVISION NO. 2, McClain County, State of Oklahoma, according to the recorded Plat thereof, commonly known as 6088 Quail Ridge Road, Blanchard, OK 73010

(the "Property").

- 3. The Debtor no longer has an ownership interest in the Property as noted by the Order Confirming Sheriff's Sale filed in The District Court in and for McClain County, State of Oklahoma, Case No. CJ-2012-148 filed on June 5, 2013. A copy of the Order is attached hereto.
- 4. Debtor has filed this Bankruptcy as an attempt to stall the eviction in said State District Case.

NOTICE OF OPPORTUNITY FOR HEARING

Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document. If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must file a written response or objection to the requested relief with the Clerk of the United States

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Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Avenue, Oklahoma City, Oklahoma 73102, no later than 14 days from the date of filing of this request for relief. You should also mail a file-stamped copy of your response or objection to the undersigned Creditor/Creditor's attorney [and others who are required to be served] and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice. The 14-day period includes the 3 days allowed for mailing provided for in Rule 9006(f) Fed.R.Bankr.Pro.

WHEREFORE, for good cause and upon consideration of the grounds above stated, Creditor requests that the Court terminate the automatic stay pursuant to 11 U.S.C. § 362; require abandonment pursuant to 11 U.S.C. § 554; award Creditor its reasonable attorney fees and costs; and to grant such other relief as the Court deems just and proper.

Respectfully submitted this 23rd day of July, 2013.

KIVELL, RAYMENT AND FRANCIS, P.C.

s/ Julie Hird Thomas

Brian J. Rayment, OBA #7441 Michael J. George, OBA #22570 Julie Hird Thomas, OBA #10660 Lauren Smith, OBA #30730 Triad Center I, Suite 550 7666 East 61st Street Tulsa, Oklahoma 74133 Phone: (918) 254-0626

Phone: (918) 254-0626 Facsimile: (918) 254-7048 E-mail: jthomas@kivell.com

ATTORNEYS FOR CREDITOR

CERTIFICATE OF MAILING/ELECTRONIC TRANSMISSION

I hereby certify that on July 23, 2013, I mailed via U.S. Mail, first class, postage prepaid and properly addressed, a true and correct copy of the above and foregoing Motion to those parties listed on the matrix attached hereto.

s/ Julie Hird Thomas

Julie Hird Thomas, OBA #10660